

CHRISTOPHER CHIOU, NVSBN 14853
Acting United States Attorney
District of Nevada

Chantal Jenkins
Special Assistant United States Attorney
Social Security Administration
160 Spear Street, Suite 800
San Francisco, CA 94105
Telephone: (415) 977-8931
Facsimile: (415) 744-0134
Email: chantal.jenkins@ssa.gov

Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SHERMAINE CARROLL,

Plaintiff,

v.

KILOLO KIJAKAZI,¹
Acting Commissioner of Social Security,

Defendant.

Case No.: 2:20-cv-01953-DJA

**UNOPPOSED MOTION FOR
EXTENSION OF TIME TO RESPOND TO
PLAINTIFF'S MOTION FOR REVERSAL
AND/OR REMAND (FIRST REQUEST)**

Defendant Kilolo Kijakazi, Acting Commissioner of Social Security ("Defendant")

respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Motion for Reversal and/or Remand (Motion) from August 2, 2021 to September 1, 2021. This is Defendant's

¹ Kilolo Kijakazi became the Acting Commissioner of Social Security on July 9, 2021. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Kilolo Kijakazi should be substituted, therefore, for Andrew Saul as the defendant in this suit. No further action need to be taken to continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 first request for extension to respond to Plaintiff's Motion and third request in this case. Defendant
2 respectfully requests this additional time because counsel currently has six other briefs due within the
3 next month and is providing three trainings to the office. Counsel also is monitoring and reviewing
4 the status of delayed certified administrative records for numerous social security cases. Counsel
5 contacted Plaintiff on July 27, 2021 and Plaintiff does not object to this request.

6 This request is made in good faith with no intention to unduly delay the proceedings.

7 Counsel apologizes to the Court for any inconvenience caused by this delay.

8 Respectfully submitted this July 27, 2021.
9

10 CHRISTOPHER CHIOU
11 Acting United States Attorney
12

13 /s/ Chantal R. Jenkins
14 CHANTAL R. JENKINS
15 Special Assistant United States Attorney
16

17 OF COUNSEL:

18 DEBORAL LEE STACHEL
19 Regional Chief Counsel, Region IX
20

21
22 IT IS SO ORDERED:

23 
24 UNITED STATES MAGISTRATE JUDGE

25 DATED: July 28, 2021
26

CERTIFICATE OF SERVICE

I, Chantal R. Jenkins, certify that the following individual was served with a copy of the
MOTION FOR EXTENSION OF TIME on the date and via the method of service identified below:

Cyrus Safa
Law Offices of Lawrence D. Rohlfsing
12631 East Imperial Highway, Suite C-115
Santa Fe Springs, CA 90670
562-868-5886
Fax: 562-868-5491
Email: rohlfsing.office@rohlfsinglaw.com

I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 27, 2021

/s/ Chantal R. Jenkins
CHANTAL R. JENKINS
Special Assistant United States Attorney